

**IN THE CIRCUIT COURT OF ST. LOUIS CITY
STATE OF MISSOURI**

JOHN A. WATSON V,

Plaintiff,

v.

AIR METHODS CORPORATION,

Defendant.

Serve:

CT Corporation System
Registered Agent for
The Air Methods Corporation
120 South Central Avenue
Clayton, MO 63105

Case No. _____

Division No. _____

JURY TRIAL DEMANDED

PETITION FOR WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY

COMES NOW Plaintiff John A. Watson V, by and through his undersigned counsel, and for his Petition against Defendant Air Methods Corporation, states as follows:

1. Plaintiff John A. Watson V is an adult citizen of the United States and a resident of the County of Madison, State of Illinois.

2. Defendant, an air medical company which provides emergency air transport and critical care services, is a corporation licensed to conduct business in the State of Missouri which conducted business within the City of St. Louis, Missouri during times relevant.

3. The acts complained of herein occurred in the City of St. Louis, State of Missouri. Therefore, venue is proper in the Circuit Court for the City of St. Louis. R.S. Mo. § 508.010.4.

4. From on or about July 22, 2013 until on or about May 23, 2014, Plaintiff was employed by Defendant as a flight paramedic.

5. Plaintiff's job duties were to provide medical care to critically ill or injured

patients being transported by Defendant's aircraft.

6. While employed with Defendant, Plaintiff observed numerous violations of federal aviation regulations, including a pilot making videos on his phone during flight, medical crew members texting during critical phases of flight, a pilot attempting to take off even though there was frost and ice accumulation on the airframe and airfoil, and a pilot purposely making dangerous "run-on landings" for his amusement.

7. Based upon federal aviation law and regulations, Plaintiff reasonably believed that the actions he observed violated the law. Those law and regulations include, but are not necessarily limited to: 49 U.S.C. Sec. 44732, 14 C.F.R. Sec. 91.21, 14 C.F.R. Sec. 91.13, 14 C.F.R. Sec. 135.144 and 14 C.F.R. 135.227.

8. Plaintiff reported his observations of illegal activity to Defendant at Defendant's office in the City of Saint Louis, State of Missouri.

9. As a result of Plaintiff reporting his observations of illegal conduct to Defendant, Defendant's management at Defendant's office in the City of Saint Louis, State of Missouri placed Plaintiff on an extended administrative leave and later fired him.

10. Defendant's actions violate Missouri's public policy exception to the employment-at-will doctrine and/or constitute an unlawful termination.

11. Plaintiff's reports of violations of federal aviation law and regulations were at least a contributing factor in Defendant's termination of Plaintiff's employment.

12. As a direct and proximate result of the unlawful termination of his employment, Plaintiff has been damaged in that he has suffered and continues to suffer lost income, lost benefits of employment, and emotional distress.

13. Defendant's actions were intentional and/or designed with an evil motive or

reckless indifference to the rights of Plaintiff and, therefore, warrant an award of punitive damages in order to punish Defendant and to serve as an example or warning to others not to engage in such conduct.

14. Plaintiff demands a trial by jury.

WHEREFORE, Plaintiff prays that after trial by jury, this Court enter judgment in his favor and against Defendant for his lost wages and other benefits of employment; compensatory damages for his emotional distress; equitable relief, including but not limited to injunctive relief, reinstatement, and front pay; prejudgment interest; punitive damages in such sum as will serve to punish Defendant and to deter Defendant and others that are similarly situated from like conduct; costs of suit; and for such other and further relief as this Court may deem just and proper under the circumstances.

LIBERMAN, GOLDSTEIN & KARSH



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St. Louis, MO 63105
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elikarsh@aol.com

Attorney for Plaintiff

**IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI**

Judge or Division: PHILIP HEAGNEY	Case Number: 1422-CC09383
Plaintiff/Petitioner: JOHN A WATSON V	Plaintiff's/Petitioner's Attorney/Address ELI KARSH 230 S BEMISTON AVENUE SUITE 1200 SAINT LOUIS, MO 63105
Defendant/Respondent: AIR METHODS CORPORATION	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Other Tort	

(Date File Stamp)

Summons in Civil Case**The State of Missouri to: AIR METHODS CORPORATION**

Alias:

CT CORPORATION SYSTEM
120 SOUTH CENTRAL AVENUE
CLAYTON, MO 63105**ST LOUIS COUNTY, MO**

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

August 7, 2014

Date

M. Jane Schweitzer
Circuit Clerk

Further Information:

Sheriff's or Server's Return**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____

_____ (name) _____ (title).

☐ other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT COURT OF CITY OF ST LOUIS, MISSOURI

Judge or Division: PHILIP HEAGNEY	Case Number: 1422-CC09383
Plaintiff/Petitioner: JOHN A WATSON V	Plaintiff's/Petitioner's Attorney/Address ELI KARSH 230 S BEMISTON AVENUE SUITE 1200 SAINT LOUIS, MO 63105
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☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

☒ other **LCW - M. SAFFELL** (name)

Served at **CT CORP.** (address)
in **St. Louis County** (County/City of St. Louis), MO, on **AUG 27 2014** (date) at **9 AM** (time).

LEISINGER (Printed Name of Sheriff or Server)

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

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